# Louisiana Department of Environmental Quality (LDEQ)
# Office of Environmental Services

## STATEMENT OF BASIS

**Hunt Forest Products Inc**
Hunt Forest Products Inc - Natalbany Plywood Mill
Natalbany, Tangipahoa **Parish, Louisiana**
**Agency Interest Number:** 31170
**Activity Number:** PER20060001
**Proposed Permit Number:** 2840-00014-V1

## I. APPLICANT

**Company:**
Hunt Forest Products, Inc.
PO Box 970
Natalbany, Louisiana 70451-0970

**Facility:**
Natalbany Plywood Mill
Hwy 51 N
Natalbany, Tangipahoa Parish, Louisiana
Latitude 30° 33' 00", Longitude 90° 29' 00"

## II. FACILITY AND CURRENT PERMIT STATUS

Hunt Forest Products Inc - Natalbany Plywood Mill is a designated Part 70 source.

| Permit No. | Unit or Source | | Date Issued |
|---|---|---|---|
| 2840-00014-V0 | GRP 1 | Entire Facility | 01/27/2002 |
| | | | |
| 2840-00014-V1 | UNF 1 | Natalbany Plywood Mill | |
| | EQT 1 | 1-94 Wood-fired Boiler | |
| | EQT 10 | 2-94 No.1 Veneer Dryer | |
| | EQT 2 | 3-94 No. 2 Veneer Dryer | |
| | EQT 4 | 4-94 Main Cyclone | |
| | EQT 4 | 5-94 Chipper Cyclone | |
| | FUG 1 | 6-94 Facility Fugitives | |
| | EQT 8 | 2-96 Plywood Press | |
| | EQT 9 | 2-01 Gasoline Tank | |
| | EQT 11 | 1-08 Regenerative Thermal Oxidizer | |

**Hunt Forest Products Inc**
**Hunt Forest Products Inc - Natalbany Plywood Mill**
**Natalbany,Tangipahoa Parish, Louisiana**
**Agency Interest Number: 31170**

## III. PROPOSED PROJECT/PERMIT INFORMATION

### Application

A permit application and Emission Inventory Questionnaire were submitted by Hunt Forest Products, Inc. on May 3, 2006 requesting a Part 70 operating permit renewal and modification. Additional information dated May 13, 2007, September 19, 2007, November 1, 2007, January 10, 2008, February 22, 2008, and March 5, 2008 was also received.

### Project

Hunt Forest Products, Inc. operates a plywood mill located in Natalbany, Louisiana, Tangipahoa Parish. Using southern yellow pine as its primary raw material, the mill produces veneer, plywood, wood chips, and landscape timbers. Logs arrive by truck and are scaled, inventoried, and stacked in the log yard. The logs are debarked, cut to block length, heated and lathed to yield green veneer. Green veneer is routed through the veneer dryers for drying. Glue is applied to the dry veneer at the layup-line. Stacked and glued veneers are then pressed to form sheets of plywood. Pressed plywood is trimmed, patched (if necessary), and sanded in finishing operation. Veneer not used to make plywood on-site, may be sold as green and/or dried veneer. Log cores from the lathing operation are processed in the chipper saw to yield green landscape timbers and chips. Wood chips are conveyed to the truck loading facility and transferred off site. Hogged bark and wood residue materials are used as boiler fuel for steam generation. The steam generated by these boilers provides heat for the log heating, drying, and pressing operations.

In addition to the requirement to request a renewal to its existing Part 70 permit, Hunt is submitting this application to effect the following changes:

- Modification of Plywood Press No. 2, Source ID No. 2-96, and removal of Plywood Press No. 1, Source ID No. 1-96;
- Reconcile various emissions at the facility due to changes in emission factors;
- Remove Source ID Nos. 12-94 and 13-94 and move them to the list of Insignificant Activities;
- Incorporate emissions of toxic air pollutants from the various sources into the permit; and

- Install a Regenerative Thermal Oxidizer (RTO), Source ID No. 1-08, for compliance with 40 CFR 63, Subpart DDDD.

**Proposed Permit**

Permit 2840-00014-V1 will be Part 70 operating permit modification of Part 70 operating permit 2840-00014-V0 for the Natalbany Plywood Mill.

**Permitted Air Emissions**

Phase I represents emissions prior to start-up of the regenerative thermal oxidizer (RTO); Phase II represents emissions after start-up of the RTO. Phase II will be effective October 1, 2008.

Estimated emissions in tons per year are as follows:

| Pollutant | Before | Phase I | Phase II | Change |
|---|---|---|---|---|
| $PM_{10}$ | 214.33 | 255.79 | 241.79 | + 27.46 |
| $SO_2$ | 3.03 | 8.93 | 8.93 | + 5.90 |
| $NO_X$ | 111.04 | 95.00 | 120.10 | + 9.06 |
| CO | 491.63 | 505.92 | 478.82 | -12.81 |
| VOC | 271.76 | 264.91 | 98.87 | -172.89 |

## IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.